

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**DAVID TYSON, JR.,**

**Plaintiff,**

**V.**

**RICHARDSON INDEPENDENT  
SCHOOL DISTRICT, and JEAN BONO,  
KIM CASTON, KAREN CLARDY,  
KATIE PATTERSON, ERON LINN,  
JUSTIN BONO, and KRISTIN KUHNE, in  
their official capacities,**

## Defendants.

**CIVIL ACTION NO. 3:18-CV-00212-K**

**JOINT SETTLEMENT ADVISORY AND**  
**MOTION FOR ABEYANCE OF CERTAIN DEADLINES**

Plaintiff David Tyson, Jr. and Defendants Richardson Independent School District, and Jean Bono, Kim Caston, Karen Clardy, Katie Patterson, Eron Linn, Justin Bono, and Kristin Kuhne, in their official capacities, file this Joint Settlement Advisory and Motion for Abeyance of Certain Deadlines, as follows:

1. The Parties advise the Court that they have reached a Settlement Agreement (“Agreement”) resolving all of Plaintiff’s claims against the Defendants. Under the Agreement, the Richardson Independent School District (“RISD”) will implement a new electoral system to elect its Board of Trustees. RISD has agreed to replace its current-at-large system of electing trustees to the board with a 5:2 electoral system (i.e., five trustees elected from single-member districts and two trustees elected at large). Under the Agreement, the populations of no fewer than two of the five single-member districts must be composed of a majority of minority citizens who are of voting age. Consistent with state law requirements, the Agreement requires the

current Board of Trustees to hold a public hearing to receive public input prior to formally adopting the system. The public hearing is scheduled for January 29, 2019, and the Board will formally adopt the 5:2 system at its regularly scheduled board meeting on February 4, 2019.

2. Pursuant to their Agreement, the Parties now jointly move this Court to abate this case, including any interim deadlines, until and through February 5, 2019. Upon the Board of Trustees' approval of the new electoral system, the Parties will jointly move this Court for approval of their Agreement (including authority to implement certain provisions therein) and dismissal of this case with prejudice.

3. This motion does not seek abeyance of the current trial date. The Parties request that the Court not move or cancel that date until the District formally adopts the 5:2 plan.

4. This motion is brought in the interests of justice and not for purposes of delay.

DATED: January 23, 2019.

Respectfully submitted,

**BREWER STOREFRONT, PLLC**

/s/ Michael J. Collins

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**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served upon all counsel of record in accordance with the Federal Rules of Civil Procedure on this 23rd day of January 2019.

/s/ Carlos G. Lopez

Carlos G. Lopez